

Facility ID: 9000745

Facility Name: KENILWORTH FUELING STATION

**I. Ownership of Tank(s)**

Owner ID: 01248

Alt. ID:

Name: POTOMAC ELECTRIC POWER COMPANY.

Street: 701 9TH ST NW, 6TH FLOOR  
C/O FARIBA MAHVI

City: Washington

County: District of Colum

State: DC

ZIP: 20068 -

Phone: (202) 872-2000

Fax:

Contact: (if other than Owner)

Taxpayer ID:

S.S. No:

Comments:

N/A

**Type of Notification**

New: ☐

Amended: ☒

Closure: ☐

Facility ID: 9000745

Alt. ID: WARD 7

Date Received: 30 Aug 2006

Facility Operator: Last, First

**II. Location of Tank(s)**

Name: KENILWORTH FUELING STATION

Street: 3400 BENNING RD NE

City: Washington

County: District of Colum

State: DC

ZIP: 20010 -

Latitude: ° ' "

Longitude: ° ' "

Phone:

Comments:

WARD 7

**III. Type of Owner**

Private

**IV. Indian Lands**

Indian Lands: ☐ Tanks are located on land within an Indian Reservation or on other trust lands.

Tribe Owned: ☐ Tanks are owned by native American nation or tribe.

Tribe:

Facility ID: 9000745

Facility Name: KENILWORTH FUELING STATION

#### V. Type of Facility

Describe the kind of facility:

Gas Station

Comments:

#### VI. Contact Persons in Charge of Tanks

Name: MAHVI, FARIBA

Address: 1900 PENNSYLVANIA AV NW, Washington, DC 20068

Phone: (202) 331-6641

Fax:

Contact Type: ☐ Owner

☐ Operator

☐ CA Contact

☐ Manager

☐ Outreach

☐ Location Contact

☐ RP

☒ Fee Contact

☒ Other

PROJECT ENGINEER

#### VII. Financial Responsibility

Facility meets financial responsibility requirements: ☒

Check all that apply:

Self-Insured: ☐

Letter of Credit: ☐

Comments:

Insurance: ☒

State Fund: ☐

Risk Retention Group: ☐

Trust Fund: ☐

Guarantee: ☐

Other: ☐

Surety Bond: ☐

Not Listed: ☐

#### VIII. Certification

Name: DENISE CAMPBELL

Title: MANAGER

Date: 30 May 2003

Facility ID: 9000745

Facility Name: KENILWORTH FUELING STATION

Latitude: ° ' " Longitude: ° ' "**IX. Description of Underground Storage Tanks****1. Status of Tank**Federally Regulated: ☒Compartment: ☐AST: ☐

Facility ID: 9000745

Amended Information: ☒Manifolded: ☐No Fee: ☐

Tank ID: 001

Tank Status: Currently In Use

Rcvd: Alt Tank ID: Comments: UTM4-A  
TANK ORIGINALLY WAS ON  
FAC.ID 7-000585 FILE.**2. Date of Installation (month/year)**

Date Installed: May 1979

**3. Estimated Total Capacity (gallons)**

Tank Capacity: 20,000

**4. Material of Construction**

Enter material of construction for the tank. You may supplement primary description with one of the Secondary Options.

Tank Material: Epoxy Coated Steel

Comments:

Sec. Tank Option: None

Check if tank has been repaired: ☐**5. Piping (Material)**

Enter material of construction for the piping. You may supplement primary description with one of the Secondary Option

Piping Material: Flexible Plastic

Comments: BUFFLEX FLEXIBL

Sec. Piping Option: Double-Walled

**6. Piping (Type)**

Type of Pipe: Pressurized

Check if piping has been repaired: ☐**7. Substance Currently or Last Stored in Greatest Quantity by Volume**

Substance: Gasoline

Comments:

CERCLA No.: Description:

Facility ID: 9000745

Facility Name: KENILWORTH FUELING STATION

## X. Tanks Out of Use, or Change in Service

### 1. Closing of Tank

NOTE: This section not available unless tank status at top of form is set to a form of closure.

Date Last Used:

Closure Status:

Date Closure Rcvd.:

Inert Fill:

Date Closed:

### 2. Site Assessment

Site Assessment Completed: ☐

Evidence of a Leak Detected: ☐

## XI. Certification of Compliance

### 1. Installation

Installer certified by tank & piping manufacturer: ☒

Manufacturer's installation checklists have been completed: ☐

Installer certified or licensed by implementing agency: ☐

Another method allowed by State agency: ☐

Installation inspected by registered engineer: ☐

Comments:

Installation inspected & approved by implementing agency: ☐

### 2. Release Detection

	Tank/Pipe	
Manual tank gauging:	<input type="checkbox"/>	<input type="checkbox"/>
Tank tightness testing:	<input type="checkbox"/>	<input type="checkbox"/>
Inventory control:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Automatic tank gauging:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Vapor monitoring:	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater monitoring:	<input type="checkbox"/>	<input type="checkbox"/>
SIR:	<input type="checkbox"/>	<input type="checkbox"/>
Interstit. Dbl-wall Monitor:	<input type="checkbox"/>	<input type="checkbox"/>
Interstit. Sec. Con. Monitor:	<input type="checkbox"/>	<input type="checkbox"/>

	Tank/Pipe	
Auto line leak detector:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Line tightness testing:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other method:	<input type="checkbox"/>	<input type="checkbox"/>
Deferred:	<input type="checkbox"/>	<input type="checkbox"/>
Not listed:	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

RLM 5000

### 3. Spill, Overfill, and Corrosion Protection

Overfill Protected: ☒

Spill Protected: ☒

CP Met on Tank & Piping: ☒

#### Installer Oath:

Name: WILLIAM ALEXANDER

Company: PETROLEUM MANAGEMENT

Position: COMPLETE CERT

Date Signed: 12 May 2003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**SUBJECT:** R3-07-NOV-UST-16

**FROM:** Carol Amend *CA* 8/10/07  
Branch Chief  
RCRA Compliance and Enforcement Branch

**TO:** Harry Daw  
Associate Director for Enforcement  
Waste & Chemicals Management Division

I recommend that you sign the attached Notice of Violation which addresses a violation of RCRA, as amended, 42 U.S.C. Sections 6901 et seq. by the Potomac Electric Power Company in Washington, DC.

**A. Respondent**

Potomac Electric Power Company  
701 9<sup>th</sup> Street NW, 6<sup>th</sup> Floor  
Washington, DC 20068

**Facility**

PEPCO Kenilworth Fueling Station  
3400 Benning Road NE  
Washington, DC 20010  
Fac. ID# 9000745

**B. Type of Action**

The recommended action is the issuance of a Notice of Violation. Based upon information presently available it is anticipated that Respondent will correct the violation stated in the NOV within the time frame specified in the letter.

**C. Summary of the Case**

The NOV cites the Potomac Electric Power Company with failure to maintain the rectifier log for the impressed current system installed on the Underground Storage Tank ("UST") system. A representative at PEPCO Kenilworth admittedly stated that checks of the rectifier were made daily, however the results were not being written down.



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Customer Service Hotline: 1-800-438-2474*

**D. State or City Involvement**

The State was notified of EPA's intent to issue this NOV on August 7, 2007.

**E. Respondent's RCRA History**

Respondent has no history of violations.

**F. EPA Policy Impact**

This case is consistent with EPA policy.

**G. Public and Congressional Relations**

No special or congressional concern is expected in response to this action.

Violation may be treated as a repeated offense and may constitute a "knowing" violation of Federal law.

This Notice of Violation is not intended to address all past violations, nor does it preclude EPA from including any ongoing, including the ones cited in this letter, or past violations in any future enforcement action. Any response to this NOV shall be addressed to:

Melissa A. Toffel  
U.S. Environmental Protection Agency - Region III  
RCRA Compliance & Enforcement Branch  
1650 Arch Street (3WC31)  
Philadelphia, PA 19103

Furthermore, if you have any questions concerning this matter, please contact Ms. Toffel at (215) 814-2060.

Sincerely,

\_\_\_\_\_  
Harry T. Daw  
Associate Director for Enforcement  
Waste and Chemicals Management Division

Enclosure

cc: S. Hamilton (DC DOE)  
Fariba Mahvi, PEPCO Kenilworth  
M. Toffel (3WC31)  
T. DiFiore (3WC31)

CONCURRENCES							
SYMBOL	3WC31	3WC31	3WC31				
SURNAME	Toffel	Owens	Amend				
DATE	8/9/07	8/9/07	8/9/07				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**FEDEX**

William J Sim, President  
Potomac Electric Power Company  
701 9<sup>th</sup> Street NW, 6<sup>th</sup> Floor  
Washington, DC 20068

10 AUG 2007

**Re: Notice of Violation Number R3-07-NOV-UST-16**  
**Underground Storage Tank Inspection, June 5, 2007**  
**Facility ID: 9000745**

Dear Mr. Sim:

On June 5, 2007, the U.S. Environmental Protection Agency, Region III ("EPA") conducted an Underground Storage Tank (UST) inspection under the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. §§ 6991 *et seq.*, and regulations promulgated pursuant thereto, as codified at 40 C.F.R. Part 280, and the District of Columbia Municipal Regulations ("DCMR") Title 20, Chapters 55 through 68, at the PEPCO Kenilworth Fueling Station facility located at 3400 Benning Road NE in Washington, District of Columbia. Based on that inspection and/or a review of other pertinent information, EPA has determined that the Potomac Electric Power Company ("PEPCO") has violated regulations promulgated under Subtitle I of RCRA. As a result of this finding the Agency is issuing this Notice of Violation (NOV). The specific violation is:

Failure to maintain rectifier logs for your Underground Storage Tank ("UST") as required by DCMR Title 20 Chapter 59, Section 5901.7(b). The comparable federal regulation is 40 C.F.R. § 280.31(d)(1).

Specifically, PEPCO failed to maintain a record of their checks of the rectifier used for cathodic protection. The regulations state that checks of the rectifier must be made every sixty days and the last three records of these inspections must be maintained at the facility. Although the facility stated that the rectifier was being checked daily to ensure it maintained the required voltage, the results were not being written down.

If you believe that EPA's determination of the alleged violation is in error, please provide an explanation of facts and circumstances explaining your position within fourteen (14) calendar days of receipt of this NOV. Otherwise, EPA will consider this case closed.

Section 9006 of RCRA authorizes EPA to take an enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as amended. Such an action could include a penalty of up to \$11,000 per day of violation. In addition, failure to achieve and maintain compliance with the regulations cited in this Notice of

*Customer Service Hotline: 1-800-438-2474*



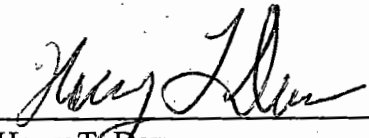
Violation may be treated as a repeated offense and may constitute a "knowing" violation of Federal law.

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Melissa A. Toffel  
U.S. Environmental Protection Agency - Region III  
RCRA Compliance & Enforcement Branch  
1650 Arch Street (3WC31)  
Philadelphia, PA 19103

Furthermore, if you have any questions concerning this matter, please contact Ms. Toffel at (215) 814-2060.

Sincerely,

  
\_\_\_\_\_  
Harry T. Daw

Associate Director for Enforcement  
Waste and Chemicals Management Division

Enclosure

cc: S. Hamilton (DC DOE)  
Fariba Mahvi, PEPCO Kenilworth  
M. Toffel (3WC31)  
T. DiFiore (3WC31)

1000

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City PHILADELPHIA State PA ZIP 19103**2 Your Internal Billing Reference**First 24 characters will appear on invoice.

OPTIONAL

**3 To**Recipient's Name William J. Sim Phone (202) 892-2000Company Potomac Electric Power Co.Recipient's Address 901 9th St. NW, 6th FloorWe cannot deliver to P.O. boxes or P.O. ZIP codes.

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Second business day.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.☐ FedEx Express Saver  
Third business day.\* Saturday Delivery NOT available.FedEx Envelope rate not available. Minimum charge: One-pound rate.\* To most locations.**4b Express Freight Service**☐ FedEx 1Day Freight\*  
Next business day.\*\* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.☐ FedEx 2Day Freight  
Second business day.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.**Packages over 150 lbs.**☐ FedEx 3Day Freight  
Third business day.\* Saturday Delivery NOT available.\* Call for Confirmation.\*\* To most locations.**5 Packaging**☒ FedEx Envelope\*☐ FedEx Pak\*  
Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.☐ FedEx Box☐ FedEx Tube☐ Other\* Declared value limit \$500.**6 Special Handling**Include FedEx address in Section 3.☐ SATURDAY Delivery  
NOT Available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 2Day Freight.☐ HOLD Weekday at FedEx Location  
NOT Available for FedEx First Overnight.☐ HOLD Saturday at FedEx Location  
Available DAILY for FedEx Priority Overnight and FedEx 2Day to select locations.**Does this shipment contain dangerous goods?**☒ No ☐ Yes  
One box must be checked. As per attached Shipper's Declaration.☐ Dry Ice  
Dry ice, 9 UN 1845☐ Cargo Aircraft OnlyDangerous goods (including dry ice) cannot be shipped in FedEx packaging.**7 Payment Bill to:**Enter FedEx Acct. No. or Credit Card No. below.☐ Sender  
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Date

Total Packages

Total Weight

Total Declared Value†

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If no one is available at recipient's address, anyone at a neighboring address may sign for delivery. *Two signatures.*

519

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**FEDEX**

Michael J. Boland, Associate General Counsel  
Pepco Holdings, Inc.  
701 9<sup>th</sup> Street NW  
Suite 1100, 10<sup>th</sup> Floor  
Washington, DC 20068

**Re: Notice of Violation Number R3-07-NOV-UST-16**  
**Facility ID: 9000745**

Dear Mr. Boland:

EPA Region III is in receipt of your response, dated August 30, 2007, to our Notice of Violation ("NOV") dated August 10, 2007. EPA alleged in the NOV that Pepco Kennilworth Fueling Station had failed to maintain a record of their checks of the rectifier used for cathodic protection. The regulations state that checks of the rectifier must be made every sixty days and the last three records of these inspections must be maintained at the facility. EPA based the alleged violation on information contained in the inspection report which stated that "According to facility personnel, someone from fleet maintenance checks the volt meter to make sure it meets the -850 millivolt requirement. However, **this is not documented.**"

EPA has reviewed the information provided in your response to the NOV, and will withdraw the NOV issued against Potomac Electric Power Company. If you have any further questions on the matter you may contact:

Furthermore, you may reach Ms. Toffel directly at (215) 814-2060.

Sincerely,

\_\_\_\_\_  
Carol Amend, Branch Chief  
RCRA Compliance & Enforcement Branch

cc: M. Toffel (3WC31)  
T. DiFiore (3WC31) S. Hamilton (DC DOE)

CONCURRENCES							
SYMBOL	3WC31	3WC31					
SURNAME	Toffel	Owens					
DATE	9/4/07	9/5/07					

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Company EPAAddress 1650 ARCH ST

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City PHILADELPHIA State PA ZIP 19103**2 Your Internal Billing Reference**First 24 characters will appear on invoice.

OPTIONAL

**3 To**
Recipient's Name Michael J. Boland Phone (202) 892-2520
Company Pepco Holdings Inc.
Recipient's Address 701 9th St. NW, Suite 1100, 10th Floor
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- ☐ **FedEx First Overnight**  
Earliest next business morning delivery to select locations.\* Saturday Delivery NOT available.
- ☐ **FedEx 2Day**  
Second business day.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx Express Saver**  
Third business day.\* Saturday Delivery NOT available.
- FedEx Envelope rate not available. Minimum charge: One-pound rate.
- \* To most locations.

**4b Express Freight Service****Packages over 150 lbs.**

- ☐ **FedEx 1Day Freight\***  
Next business day.\*\* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx 2Day Freight**  
Second business day.\*\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- ☐ **FedEx 3Day Freight**  
Third business day.\*\* Saturday Delivery NOT available.
- \* Call for Confirmation. \*\* To most locations.

**5 Packaging**

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NOT Available for FedEx First Overnight.
- ☐ **HOLD Saturday at FedEx Location**  
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**Does this shipment contain dangerous goods?**One box must be checked.

- ☒ **No**
- ☐ **Yes**  
As per attached Shipper's Declaration.
- ☐ **Yes**  
Shipper's Declaration not required.
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- ☐ **Credit Card**
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FedEx Acct. No.  
Credit Card No.Exp.  
Date

Total Packages

Total Weight

Total Declared Value<sup>1</sup>

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If no one is available at recipient's address, anyone at a neighboring address may sign for delivery. Fee applies.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**FEDEX**

Michael J. Boland, Associate General Counsel  
Pepco Holdings, Inc.  
701 9<sup>th</sup> Street NW  
Suite 1100, 10<sup>th</sup> Floor  
Washington, DC 20068

06 SEP 2007

**Re: Notice of Violation Number R3-07-NOV-UST-16**  
**Facility ID: 9000745**

Dear Mr. Boland:

EPA Region III is in receipt of your response, dated August 30, 2007, to our Notice of Violation ("NOV") dated August 10, 2007. EPA alleged in the NOV that Pepco Kennilworth Fueling Station had failed to maintain a record of their checks of the rectifier used for cathodic protection. The regulations state that checks of the rectifier must be made every sixty days and the last three records of these inspections must be maintained at the facility. EPA based the alleged violation on information contained in the inspection report which stated that "According to facility personnel, someone from fleet maintenance checks the volt meter to make sure it meets the -850 millivolt requirement. However, **this is not documented.**"

EPA has reviewed the information provided in your response to the NOV, and will withdraw the NOV issued against Potomac Electric Power Company. If you have any further questions on the matter you may contact:

Melissa A. Toffel  
U.S. Environmental Protection Agency - Region III  
RCRA Compliance & Enforcement Branch  
1650 Arch Street (3WC31)  
Philadelphia, PA 19103

Furthermore, you may reach Ms. Toffel directly at (215) 814-2060.

Sincerely,

Carol Amend, Branch Chief  
RCRA Compliance & Enforcement Branch

cc: M. Toffel (3WC31)  
T. DiFiore (3WC31)  
S. Hamilton (DC DOE)

**Michael J. Boland**  
Associate General Counsel

202 872-2520  
202 872-3281 Fax  
mjboland@pepco.com

August 30, 2007

**VIA OVERNIGHT MAIL**

Ms. Melissa A. Toffel  
U.S. Environmental Protection Agency - Region III  
RCRA Compliance & Enforcement Branch  
1650 Arch Street (3WC31)  
Philadelphia, Pennsylvania, 19103

**Re: Notice of Violation Number R3-07-NOV-UST-16**  
**Underground Storage Tank Inspection, June 5, 2007**  
**Facility ID: 9000745**

Dear Ms. Toffel:

This letter is in response to the referenced Notice of Violation (NOV) which was received by Potomac Electric Power Company (Pepco) on August 20, 2007.

The NOV alleges that Pepco failed to maintain rectifier logs for the Underground Storage Tank (UST) as required by DCMR Title 20 Chapter 59, Section 5901.7(b). The comparable federal regulation is 40 C.F.R. § 280.31(d) (1). The NOV states "Specifically, Pepco failed to maintain a record of their checks for the rectifier used for cathodic protection. The regulations state that checks of the rectifier must be made every sixty days and the last three records of these inspections must be maintained at the facility. Although the facility stated that the rectifier was being checked daily to ensure it maintained the required voltage, the results were not being written down."

The NOV appears to be based on Ms. Heather Wright's report of June 5, 2007 UST compliance inspection wherein Ms. Wright has noted on the UST compliance checklist that "according to facility personnel, someone from fleet maintenance checks the voltmeter to make sure it meets the -850 milivolt requirements. However, this is not documented."

Pepco believes that EPA's determination of the alleged violation is in error and offers the following evidence in support of its position.

Current regulations require that rectifier readings be taken and documented on a bi-monthly basis. Pepco personnel inspect the rectifier on a monthly basis to ensure its proper

operation. The voltage and current outputs are read from the existing rectifier analog meter located at the Kenilworth Fueling Station and are documented on the UST system inspection log. Enclosed please find the January to July 2007 UST system inspection logs for the Kenilworth Fueling Station which demonstrates Pepco's compliance.

Pepco also believes there was some confusion in the explanation that was provided by the Pepco representative to the EPA inspector as to the type of readings that are conducted at the rectifier. The -850 milivolt requirement noted by the inspector is indicative of the criteria for cathodic protection on the protected structure and is not relative to the total voltage output of the rectifier ( NACE Standard RP0285-2002, Corrosion Control of Underground Storage Tank Systems by Cathodic Protection). The Impressed Current Cathodic Protection (ICCP) system is configured in such a manner that cathodic protection levels can only be measured on the structure utilizing a portable copper-copper sulfate reference electrode in conjunction with a digital voltmeter. These levels are verified on an annual basis on the underground storage tank (UST) located at the Kenilworth Fueling Station. Enclosed please find the 2006 and 2007 annual test results of the ICCP on the UST at the Kenilworth Fueling Station.

Based on the evidence presented in this letter, Pepco met the requirements of DCMR Title 20 Chapter 59, Section 5901.7(b) and the comparable federal regulation 40 C.F.R. § 280.31(d) (1) and there was no violation. I therefore respectfully request that the NOV be withdrawn.

Please do not hesitate to contact me at the above number if you wish to discuss this matter further or need additional information.

Sincerely,



Michael J. Boland

cc: Ms. S. Hamilton (DC DOE)  
T. DiFiore (3WC31)

Enclosures (3)

# UST System Inspection Log

Circle appropriate response or complete the information as necessary

UST System Location: <b>Kenilworth 2007</b>	
Monthly Inspection Dates (30 days):	JAN Feb MARCH APRIL MAY JUNE
Items To Be Inspected	
Cathodic Protection System (Kenilworth Only)	OK OK OK OK OK OK
Voltage (V) (turn switch to voltage)	14V 14V 14V 14V 14V 14V
Current (I) (turn switch to ampere)	1.25 2.5 2.5 2.5 2.5 2.5
Note: Voltage and current readings can fluctuate, but <u>must</u> not vary greatly from the previous month's reading.	
Trouble Shooting: V & I = 0 Fuse Blown V = 15 & I = 0 Wire Broken I = 0 or low Change Battery	
Check Fill Lines For:	
Markings on the Manhole Covers	
Gasoline - White Circle w/Black Cross	Y/N Y/N Y/N Y/N Y/N Y/N
Diesel - Yellow Hexagon	Y/N Y/N Y/N Y/N Y/N Y/N
Vapor Recovery - Orange Circle	Y/N Y/N Y/N Y/N Y/N Y/N
Monitoring Pipe - White Circle with Black Triangle	Y/N Y/N Y/N Y/N Y/N Y/N
Markings on the Fill Pipes	
Product Name Visible	Y/N Y/N Y/N Y/N Y/N Y/N
Tank Size Visible	Y/N Y/N Y/N Y/N Y/N Y/N
Check Observation Wells For:	
Locked covers	Y/N Y/N Y/N Y/N Y/N Y/N
Liquid-tight threaded caps or removable liquid-tight threaded plugs	Y/N Y/N Y/N Y/N Y/N Y/N
Odors	Y/N Y/N Y/N Y/N Y/N Y/N
Are all catchment basins & sumps clean & dry?	Y/N Y/N Y/N Y/N Y/N Y/N
Check Product Signs For:	
Size - ≥ 8" x 10"	Y/N Y/N Y/N Y/N Y/N Y/N
Clear visibility from fill pipe	Y/N Y/N Y/N Y/N Y/N Y/N
Product Name	Y/N Y/N Y/N Y/N Y/N Y/N
Letters ≥ 5/16"	Y/N Y/N Y/N Y/N Y/N Y/N
Alarms Activated? Veeder-Root console must indicate All Functions Normal	Y/N Y/N Y/N Y/N Y/N Y/N
Interstitial Monitor OK? (Veeder Root System at Forestville must indicate All Functions Normal)	Y/N Y/N Y/N Y/N Y/N Y/N
Automatic Tank Gauges OK?	Y/N Y/N Y/N Y/N Y/N Y/N
Automatic Line Detection OK?	Y/N Y/N Y/N Y/N Y/N Y/N
Corrective Actions Taken? <sup>(1)</sup>	Y/N Y/N Y/N Y/N Y/N Y/N
Time Inspection Completed	10:30 AM 11:00 AM 10:00 AM 10:00 AM 10:1 AM 10:00 AM
Date Inspection Completed	1/29/07 2/2/07 3/28/07 4/26/07 5/30/07 6/26/07
Inspector's Full Name	Jim Markel Jim Markel Jim Markel Jim Markel Jim Markel Jim Markel

2.5

← Kenilworth HAS Antidial Alarm 6/26/07

<sup>(1)</sup> If yes, describe what actions were taken, when and by whom. Use the back of the form if necessary.

1/29/07 (Clean, wipe out CATCHMENT BASINS, WATER FROM CAUTION 4/26/07 NO LOCK ON VAPOR RECOVERY CAP, 4/27/07 made repairs)




Hardcopies of this document may not be the most current revision. Refer to VRM Fleet Web Page to verify the most current revision.

5/30/07 - The new fill hole cover are not mark.



# UST System Inspection Log

Circle appropriate response or complete the information as necessary

UST System Location: <b>Kenilworth 2007</b>		July	Aug	Sept	Oct	Nov	Dec
Monthly Inspection Dates (30 days):							
Items To Be Inspected							
Cathodic Protection System (Kenilworth Only)							
Voltage (V) (turn switch to voltage)		OK					
Current (I) (turn switch to amperes)		14V					
Note: Voltage and current readings can fluctuate, but <u>must</u> not vary greatly from the previous month's reading.		.25					
Trouble Shooting: V & I = 0      Fuse Blown V = 15 & I = 0      Wire Broken I = 0 or low      Change Battery							
Check Fill Lines For:							
Markings on the Manhole Covers							
Gasoline - White Circle w/Black Cross 		Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
Diesel - Yellow Hexagon		Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
Vapor Recovery - Orange Circle 		Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
Monitoring Pipe - White Circle with Black Triangle 		Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
Markings on the Fill Pipes							
Product Name Visible		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Tank Size Visible		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Check Observation Wells For:							
Locked covers		Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
Liquid-tight threaded caps or removable liquid-tight threaded plugs		Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
Odors		Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
Are all catchment basins & sumps clean & dry?		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Check Product Signs For:							
Size - $\geq 8" \times 10"$		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Clear visibility from fill pipe		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Product Name		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Letters $\geq 5/16"$		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Alarms Activated? Veeder-Root console must indicate All Functions Normal		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Interstitial Monitor OK? (Veeder Root System at Forestville must indicate All Functions Normal)		Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
Automatic Tank Gauges OK?		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Automatic Line Detection OK?		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Corrective Actions Taken? <sup>(1)</sup>		Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
Time Inspection Completed	10:00 AM						
Date Inspection Completed	7/26/07						
Inspector's Full Name	Jim Mikel						

<sup>(1)</sup> If yes, describe what actions were taken, when and by whom. Use the back of the form if necessary.

## CAUTION

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Refer to VRM Fleet Web Page to verify the most current revision.

August 29, 2007

Benning Generating Station  
Building 75  
3400 Benning Road, NE  
Washington, DC 20019

Attn: Garry Gordon

Re: Five Year Corrosion Control System Assessment  
ICCP for One (1) 20K gallon STI-P3 UST  
Kenilworth Fueling Station – PEPCO Benning Road Generating Station  
Washington, DC

Dear Mr. Gordon:

On August 27<sup>th</sup>, 2007, a Piping & Corrosion Specialties Corrosion Technician completed a Five Year Corrosion Control System Assessment at the above referenced location. This testing was performed utilizing the criteria for cathodic protection specified in NACE Standard RP0285-2002 "*Corrosion Control of Underground Storage Tank Systems by Cathodic Protection*" - Section 5.2.1.1. This assessment also included: a detailed inspection of the ICCP system rectifier components, verification of the rectifier meter calibration by measuring voltage and current outputs with a digital voltmeter, and a review of the bi-monthly rectifier inspection methods with company representatives. The assessment was performed under the supervision of a P&C expert in corrosion control.

Interrupted structure-to-soil potential measurements were taken at specific test points above the tank utilizing a copper-copper sulfate reference electrode in conjunction with a high impedance voltmeter. The data collected during the survey indicate that the tank is in compliance with Federal and State regulations for external corrosion control.

Field data sheets including a Monthly Rectifier Monitoring Log are attached for your records.

Please do not hesitate to call us if you have any additional questions.

Sincerely,



James L. Quirk IV  
Cathodic Protection & Integrity Manager

[illegible]

# PIPING & CORROSION SPECIALTIES INC.

P.O. BOX 10 • PASADENA, MARYLAND 21123  
BALTIMORE (410) 544-3232 • FAX (410) 544-1600 • WASHINGTON METRO (301) 261-1590

September 29, 2006

PEPCO  
8400B Old Marlboro Pike  
Upper Marlboro, Maryland 20772

Attn: Shirley Fletcher

Re: ICCP for 20,000 gallon STI-P3 UST  
Benning Road, Washington, D.C.

Dear Ms. Fletcher,

We've completed our corrosion survey of the above referenced tank. NACE RP-0169-2002 and RP-0285 were used as the testing criteria. A circuit interrupter was connected at the rectifier; "On" and "Instant Off" structure-to-electrolyte potentials were then taken against a Cu-CuSO<sub>4</sub> reference cell by contacting the tank bottom through the fill riser. The structure showed potentials that meet the -850 millivolt "Instant Off" criterion, and therefore comply with State and Federal regulations for corrosion mitigation. Specific test values are included on the attached data sheet.

To ensure ongoing protection, it is recommended that the system be monitored annually.

Please let us know if you have any questions, or require further assistance.

Sincerely,



Gerald Gillen  
NACE Corrosion Technician  
Certification #9212

